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FILED US District Court-UT
DEC 20 '23 AM 10:30

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ERVIN EDEL PARRA-MONTOYA
and
ALEXANDER EDUARDO PARRA-MERCADO,

Defendants.

INDICTMENT

Count 1: 21 U.S.C. §§ 841(a)(1) and 846,
Conspiracy to Distribute Cocaine (ALL
DEFENDANTS)

Count 2: 18 U.S.C. § 924(c)(1)(A),
Possession of a Firearm in Furtherance of a
Drug Trafficking Crime (PARRA-
MONTOYA)

Case: 2:23-cr-00458

Assigned To : Barlow, David

Assign. Date : 12/19/2023

Description: USA v. Parra Montoya et al

The Grand Jury charges:

COUNT 1

21 U.S.C. §§ 841(a)(1) and 846
(Conspiracy to Distribute Cocaine)

Beginning on a date unknown, but by at least December 11, 2023, and continuing
through December 13, 2023, in the District of Utah and elsewhere,

ERVIN EDEL PARRA-MONTOYA, and
ALEXANDER EDUARDO PARRA-MERCADO,

the defendants herein, did knowingly and intentionally conspire with each other and with
others known and unknown, to distribute cocaine, a Schedule II controlled substance

within the meaning of 21 U.S.C. § 812; in violation of 21 U.S.C. §§ 841(a)(1) and 846, and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 2

18 U.S.C. § 924(c)(1)(A)

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about December 13, 2023, in the District of Utah,

ERVIN EDEL PARRA-MONTOYA,

defendant herein, did knowingly and intentionally possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States as set forth in Count 1, incorporated herein, that is, knowingly and intentionally conspiring to distribute cocaine, in violation of 21 U.S.C. §§ 841(a)(1) and 846; all in violation of 18 U.S.C. § 924(c)(1)(A).

NOTICE OF INTENT TO SEEK FORFEITURE

Pursuant to 21 U.S.C. § 853, upon conviction of any offense violating 21 U.S.C. § 841, the defendant shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses.

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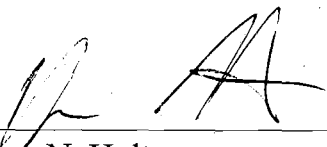
The property to be forfeited includes, but is not limited to:

- \$42,066 in U.S. currency

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

TRINA A. HIGGINS
United States Attorney



Ryan N. Holtan
Special Assistant United States Attorney